

The proposed Commission rules that would require broadcasters to maintain program recordings are both unnecessary and grossly overbroad. Indecency in the media has garnered much press attention lately. However, the primary assumption that is driving these proceedings -- that broadcasters are abusing the public airwaves with filthy content -- has been widely oversaturated. In the past five years, the broadcasters that the Commission has cited for indecency represent a remarkably small fraction of the industry. To burden the large majority of innocent broadcasters who maintain a lawful slate of programming with these costly recording requirements is misguided and shockingly reactionary. If the Commission enacts these recording requirements, it will appear to the general public painfully susceptible to popular political sentiment -- even when that sentiment is woefully out of touch with reality.